

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

SAUL CHAMBA CHIQUI)

Case No. 1:25-MJ-157 DJS)

Defendant.)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about May 23, 2025, in the county of Albany in the Northern District of New York the defendant violated:

Code Section

8 U.S.C. § 1326(a)

Offense Description

The defendant, an alien, native and citizen of Ecuador, after having been removed from the United States, entered and was thereafter found in the United States without the Attorney General of the United States, or his successor, the Secretary of the Department of Homeland Security, having expressly consented to his reapplication for admission into the United States.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

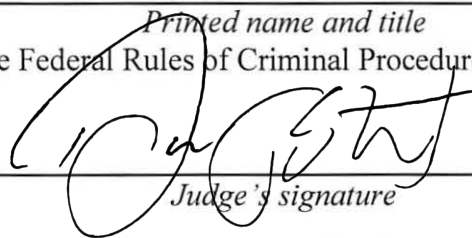

Complainant's signature

Timothy W. Irving, U.S. Homeland Security Investigations

Printed name and title

Attested to by the Affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: May 26, 2025, 1:41 p.m.


Judge's signature

City and State: Albany, New York

Hon. Daniel J. Stewart, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, United States v. Saul CHAMBA CHIQUI

On May 23, 2025, Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) assisted with a joint New York State traffic initiative in the City of Cohoes, NY.

During the traffic initiative Saul CHAMBA CHIQUI, a citizen and national of Ecuador, was encountered by ERO Deportation Officer (DO) Willmer Torres. CHAMBA CHIQUI was in possession of an Ecuador driver's license and Ecuador government identification card. Law enforcement database checks revealed that CHAMBA CHIQUI illegally re-entered the United States. CHAMBA CHIQUI was taken into custody and transported to the ICE Office in Malta, NY.

Upon arrival at the ICE Malta Office, biographical information and fingerprints were entered into Department of Homeland Security databases for CHAMBA CHIQUI. Record checks revealed CHAMBA CHIQUI is a citizen of Ecuador. CHAMBA CHIQUI was first encountered by the United States Border Patrol (USBP) on August 24, 2020, near Hidalgo, TX and issued an administrative Expedited Removal (ER). On October 16, 2020, CHAMBA CHIQUI was removed from the United States to Ecuador from the Valley International Airport, in Harlingen, TX. On October 2, 2024, CHAMBA CHIQUI was encountered by USBP near Picacho, AZ, and his prior order of removal was reinstated. CHAMBA CHIQUI was removed from the United States to Ecuador on November 19, 2024, from the Alexandria International Airport, in Alexandria, LA. On May 23, 2025, CHAMBA CHIQUI's prior order of removal was reinstated.

CHAMBA CHIQUI has not received the express consent of the Attorney General of the United States, or his successor, the Secretary of Homeland Security, to apply for readmission into the United States.